

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 11
)
ATLANTA LIGHT BULBS, INC.,)
)
Debtor.) CASE NO. 22-52950-pmb

SWORN DECLARATION OF JESSE ROOT

Jesse Root deposes and says:

1. I give this Sworn Declaration in support of my response to the *Motion to Dismiss Bankruptcy Case* filed by Tandem Bank in the above-styled case, the *Motion for Relief from Stay* filed by Tandem Bank in the above-styled case, and for all other purposes permitted by law in the above-styled bankruptcy case.
2. I am over the age of 18, have no disability that would prevent me from testifying competently, and I have personal knowledge of the matters set out herein.
3. My father, Gary Root, founded Atlanta Light Bulbs, Inc. (“ALB”) approximately 41 years ago in 1981.
4. ALB was a successful business for decades, with a large customer base and innovative products. ALB sold such products as specialty lamps, projector lamps, medical lamps, miniature lamps, light fixtures, and lighting installations, and moved into newer products such as LED lighting as they entered the market.
5. In 1998, ALB launched a website, becoming one of the first companies in Atlanta to offer its inventory and services online.
6. ALB has been known in the lighting industry for decades, including due to the participation of the Root family in industry groups. Gary Root served on various industry boards and

committees over the years, including The National Association of Independent Lighting Distributors (“NALD”), where he served on the board from 2000 through 2006 and where he served as President from 2004 through 2005. I have also been active in industry groups such as NALD.

7. I went to work for ALB beginning in approximately 2008, holding various positions over the years and going from being an account manager, to a sales manager, to a co-owner and the Vice President of Sales who supervised all sales activity for ALB.
8. My father, Gary Root, died in 2017 after a hard battle with a long-term illness.
9. After my father’s death in 2017, 50% of ALB was sold by my brother to Jessica Mendoza (“Ms. Mendoza”) who became the CEO of ALB.
10. In the capacity of also being a fifty percent (50%) owner of ALB, I raised questions with Ms. Mendoza about how the finances of ALB were being handled and I requested access to certain financial data that was not being provided to me by Ms. Mendoza. In response, Ms. Mendoza terminated my employment with ALB in 2021.
11. Ms. Mendoza hired her boyfriend, Robert Taitz (“Mr. Taitz”), to work for ALB.
12. Ms. Mendoza also hired her family members and/or Mr. Taitz’s family members to work for ALB.
13. I understand that an unsecured creditors committee was appointed in this case very recently, and that the unsecured creditors committee intends to move for appointment of a Chapter 11 Trustee.
14. I believe that ALB could be a successful business, under appropriate management, in light of its decades of experience in the lighting industry, its reputation in the industry (although

now somewhat damaged by recent actions), and the relationships with customers and vendors that could be restored under proper management.

15. If a Chapter 11 Trustee were to be appointed by the Court, I am prepared to meet with the Chapter 11 Trustee and to assist him or her.

16. I have reviewed the photographs that my legal counsel submitted as Exhibits "A" through "F" to the response to the Motion to Dismiss of Tandem Bank. Those photographs are of the premises where ALB has maintained a showroom and warehouse since the 1990s. Even when ALB rented other office space, it continued to occupy that showroom and warehouse.

17. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This 12th day of June, 2022.

/s/ Jesse Root
Jesse Root

[Notarization unnecessary pursuant to 28 U.S.C. 1746]

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CERTIFICATE OF SERVICE

I hereby certify that I have on this day electronically filed the foregoing document using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program, and that I served the foregoing document by depositing a copy of the same in the United States mail with adequate postage on the following:

- **John C. Cannizzaro** john.cannizzaro@icemiller.com
- **Thomas Dworschak** thomas.w.dworschak@usdoj.gov, ltctommyd@aol.com
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This 13th day of June, 2022.

ROBL LAW GROUP LLC

/s/ Michael Robl _____
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